

1 BARNEY C. ALES, LTD.
2 Barney C. Ales, Esq.
3 Nevada Bar No. 0127
4 Mailing Address:
5 PO Box 20563
6 Las Vegas, NV 89112
7 222 Guidance Ridge Court
8 Henderson, NV 89012
9 (702) 998-9576
10 attorneyales@gmail.com
11 Attorneys for Plaintiff

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 PLAYERS NETWORK, INC., a Nevada
15 Corporation;

16 Plaintiff,

17 vs.

18 WHC CAPITAL, LLC, a Delaware limited
19 liability company; CLEAR TRUST, LLC, a
20 Florida limited liability company and, DOES
21 1-10;

22 Defendants.

Case No.: 2:15-cv-00916-RFB-VCF

STIPUALATION AND ORDER
TO EXTEND THE TIME TO FILE
OPPOSITION TO
MOTION TO TRANSFER AND
TO FILE REPLY TO THE
COUNTERCLAIM

(First Request)

23 WHEREAS, Defendant, WHC Capital, LLC filed a Notice of Removal to Federal Court
24 on May 15, 2015 (Doc #1); and,

25 WHEREAS, Defendant, WHC Capital, LLC filed an Answer and Counterclaim on May
26 28, 2015 (Doc #7); and,

27 WHEREAS, Defendant, WHC Capital, LLC filed a motion to transfer on May 28, 2015
28 (Doc #8); and,

1 WHEREAS, Plaintiff, Players Network, would ordinarily have fourteen (14) days or until
2 June 11, 2015 to file its response to the motion to transfer; and,

3 WHEREAS, Plaintiff, Players Network, would ordinarily have twenty (20) days or until
4 June 17, 2015 to file its reply to the counterclaim; and,

5 WHEREAS, Defendant, Clear Trust, LLC, has not entered an appearance in this legal
6 action;
7

8 WHEREAS, Plaintiff, Players Network and Defendant, WHC Capital, LLC have
9 tentatively reached an agreement to settle and resolve all issues raised in the pleadings filed in
10 this legal action; and,

11 WHEREAS, a formal written settlement agreement has been prepared and it is being
12 reviewed by the parties; and,
13

14 WHEREAS, it is expected that this legal action will be dismissed after the formal
15 settlement agreement is executed; and,

16 WHEREAS, the parties wish to avoid any further attorneys' fees and cost associated
17 with this legal action pending execution of the formal settlement agreement; and,

18 NOW THEREFORE, IT IS STIPULATED AND AGREED by and between Plaintiff,
19 Players Network, by and through its attorney, Barney C. Ales, Esq. of Barney C. Ales, Ltd., and
20 Defendant, WHC Capital, LLC, by and through its attorney, Jacquelyn S. Leleu, Esq., of
21 McDonald Carano Wilson LLP as follows:
22

23 1. That the time for Players Network to file its opposition to the motion to transfer
24 shall be extended by fourteen (14) days to June 25, 2015; and,

25 ///

26 ///

27 ///

2. That the time for Players Network to file its reply to WHC Capital, LLC's counterclaim shall be extended by fourteen (14) days to July 1, 2015.

DATED this 11th day of June, 2015.

BARNEY C. ALES, LTD.

MCDONALD CARANO WILSON LLP

By: /s/ Barney C. Ales

By: /s/ Jacquelyn S. Leleu

Barney C. Ales
Nevada Bar No. 127
Mailing address:
P.O. Box 20563
Las Vegas, NV 89112

Jacquelyn S. Leleu
Nevada Bar No. 7675
2300 West Sahara Avenue, Suite 1200
Las Vegas, NV 89102

*Attorney for Plaintiff
Players Network*

Attorneys for Defendants WHC Capital, LLC

IT IS SO ORDERED:



United States Magistrate Judge
Dated: June 19, 2015